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Department of Energy

Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

0041021

APR 10 1995

95-PCA-262

Mr. Joseph J. Witczak  
Unit Supervisor  
Regulatory and Technical  
Support Unit  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
P.O. Box 47600  
Olympia, Washington 98504-7600

Mr. Moses N. Jaraysi  
Unit Supervisor  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
1315 West Fourth Avenue  
Kennewick, Washington 99336

Dear Messrs. Witczak and Jaraysi:

QUARTERLY NOTIFICATION OF CLASS 1 MODIFICATIONS TO THE HANFORD FACILITY  
RESOURCE CONSERVATION AND RECOVERY ACT PERMIT (RCRA PERMIT), DANGEROUS WASTE  
PORTION (QUARTER ENDING MARCH 31, 1995)

Condition I.C.3. of the RCRA Permit, Dangerous Waste Portion (DW Portion),  
addresses Class 1 modifications as defined in Washington Administrative Code  
(WAC) 173-303-830(4)(a)(i)(A). This condition allows for notification of  
Class 1 modifications to be made to the State of Washington Department of  
Ecology (Ecology) on a quarterly basis. These modifications are under  
implementation. A listing of these modifications is maintained in the Hanford  
Facility Operating Record. The Class 1 modifications are discussed below.

Part III of the DW Portion is being modified to update information included in  
the Hanford Facility RCRA Permit, DW Portion. Only the 305-B Storage Facility  
made Class 1 modification during this quarter. The Class 1 modifications are  
being made to ensure that all activities conducted are in compliance with the  
RCRA Permit. The enclosure to this letter includes the Part III Class 1  
Modifications to the RCRA Permit.

Should Ecology determine that the enclosed modifications do not qualify as  
Class 1 modifications as defined in WAC 173-303-830, written authorization to  
continue operations is requested until the appropriate level of modification  
can be accomplished.

In accordance with a teleconference held with Mr. Moses Jaraysi of Ecology on  
March 3, 1995, a transmittal letter signed by the permittees is sufficient to  
authorize the submittal of the Quarterly Notification of Class 1 Modifications  
to the Hanford Facility RCRA Permit, DW Portion and to meet the intent of RCRA  
Permit Condition I.F., Signatory Requirement.



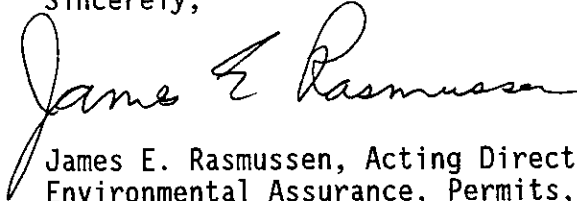
APR 10 1995

Messrs. Witczak and Jaraysi  
95-PCA-262

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Should you have any questions regarding this information, please contact Mr. C. E. Clark, U.S. Department of Energy, Richland Operations Office, at (509) 376-9333; Mr. R. C. Brunke, Westinghouse Hanford Company, at (509) 376-2663; Mr. H. T. Tilden II, Pacific Northwest Laboratory, at (509) 376-0499; or Ms. J. W. Badden, Bechtel Hanford, Inc., at (509) 372-9204.

Sincerely,

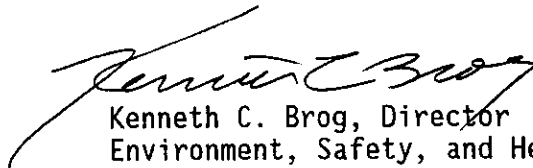


James E. Rasmussen, Acting Director  
Environmental Assurance, Permits,  
and Policy Division  
DOE Richland Operations Office

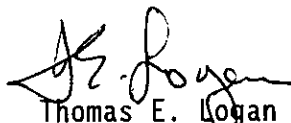
EAP:CEC



William T. Dixon, Director  
Environmental Services  
Westinghouse Hanford Company



Kenneth C. Brog, Director  
Environment, Safety, and Health  
Pacific Northwest Laboratory



Thomas E. Logan  
Manager of Projects  
Bechtel Hanford, Inc.

## Enclosure:

Class 1 Modifications Required  
to Update the Hanford Facility  
RCRA Permit (Quarter ending  
March 31, 1995)

cc w/encl:  
EDMC, H6-08  
D. Duncan, EPA  
R. Jim, YIN  
D. Powauke, NPT  
J. Wilkinson, CTUIR

cc w/o encl:  
J. Badden, BHI  
D. Broussard, PNL  
W. Dixon, WHC  
S. Price, WHC  
J. Stohr, Ecology  
H. Tilden, PNL

CLASS 1 MODIFICATIONS REQUIRED TO UPDATE THE  
HANFORD FACILITY RCRA PERMIT, DANGEROUS WASTE PORTION  
(Quarter ending March 31, 1995)

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PART III CLASS 1 MODIFICATIONS REQUIRED TO UPDATE  
305-B STORAGE FACILITY UNIT-SPECIFIC CONDITIONS

Section 1.A: 305-B Chemical Waste Storage Unit (305-B) Part B Permit  
Application, Rev.2

- Page 6-7, Lines 39-40: Delete "The records of these inspections are transmitted to waste management operations staff and maintained at 305-B."

Reason: Lines 44-47 in the same paragraph were added during a revision of the 305-B Storage Facility Part B Permit application, to correctly reflect the safety equipment record keeping procedures at that time. During the revision the referenced sentence (lines 39-40) was inadvertently not deleted.

- Page 6-7, Line 47: Delete "Craft Services Organization" and replace with "Facilities Management Department and Technical Services Department."

Reason: Then change correctly reflects the organizations that maintain the associated records for the safety equipment inspections.

Section 1.B: Dangerous Waste Portion (DW Portion) of the Resource  
Conservation and Recovery Act Permit WA7890008967

- Page 62, Line 5: Add "as appropriate for the waste stream" after the word "performed."

Reason: This action/approach was verbally agreed upon between the U.S. Department of Energy, Richland Operations Office (RL), Pacific Northwest Laboratory (PNL), and State of Washington Department of Ecology (Ecology) Staff during the October 21, 1994 Hanford Facility Permit Implementation meeting.

Some tests specified in lines 7-25 are inappropriate for certain waste streams (e.g., Flash point on inorganic acids; pH tests on organics; oxidizer/sulfide/cyanide tests on wastes not thought to contain these substances; and volatile organic compound tests on inorganics).

- Page 62 Lines 12-13: Delete "B."

Reason: This action/approach was verbally agreed upon between RL, PNL, and Ecology Staff during the October 21, 1994 Hanford Facility Permit Implementation meeting.

HAZCAT flammability procedure B does not exist.

CLASS 1 MODIFICATIONS REQUIRED TO UPDATE THE  
HANFORD FACILITY RCRA PERMIT, DANGEROUS WASTE PORTION  
(Quarter ending March 31, 1995)

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- Page 62 Line 6: Delete the words "within a 10% tolerance" from the sentence.

Reason: This action/approach was verbally agreed upon between RL, PNL, and Ecology Staff during the October 21, 1994 Hanford Facility Permit Implementation meeting.

The 10 percent tolerance limit is meaningless for semi-quantitative or qualitative yes/no type tests. It is also meaningless for logarithmic test data such as pH units.

- Page 62 Lines 38-40: Delete the sentence and replace with the following language:

"If not, the waste is rejected and returned to the generating unit. Sampling and analysis data for the waste will be required to be included with a resubmitted CDRR if generator process knowledge or other information is not available to properly characterize and identify the waste."

Reason: This action/approach was verbally agreed upon between RL, PNL, and Ecology Staff during the October 21, 1994 Hanford Facility Permit Implementation meeting.

Not all situations warrant sampling and analysis to identify the waste and determine waste characteristics.

- Page 63 Lines 29-34: Delete the two sentences after the phrase "Sampling Methods, respectively."

Reason: This action/approach was verbally agreed upon between RL, PNL, and Ecology Staff during the October 21, 1994 Hanford Facility Permit Implementation meeting.

A five percent floating average verification method may not functionally work to achieve the required five percent confirmation of designation target for a fiscal year. Highly variable monthly waste generation rates may result in confirmation of designation frequencies significantly higher or lower than intended five percent. At least five percent of waste received per fiscal year will undergo confirmation of designation as required.

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**CLASS 1 MODIFICATIONS REQUIRED TO UPDATE THE  
HANFORD FACILITY RCRA PERMIT, DANGEROUS WASTE PORTION  
(Quarter ending March 31, 1995)**

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**PART III CLASS 1 MODIFICATIONS REQUIRED TO UPDATE 616 NONRADIOACTIVE  
DANGEROUS WASTE STORAGE FACILITY UNIT-SPECIFIC CONDITIONS**

No Class 1 Modifications to the Hanford Facility RCRA Permit, DW Portion for this quarter.

**PART III CLASS 1 MODIFICATIONS REQUIRED TO UPDATE 183-H SOLAR  
EVAPORATION BASIN UNIT-SPECIFIC CONDITIONS**

No Class 1 Modifications to the Hanford Facility RCRA Permit, DW Portion for this quarter.

**PART III CLASS 1 MODIFICATIONS REQUIRED TO UPDATE 300 AREA  
SOLVENT EVAPORATOR UNIT-SPECIFIC CONDITIONS**

No Class 1 Modifications to the Hanford Facility RCRA Permit, DW Portion for this quarter.

**PART III CLASS 1 MODIFICATIONS REQUIRED TO UPDATE  
2727-S NONRADIOACTIVE DANGEROUS WASTE  
STORAGE FACILITY UNIT-SPECIFIC CONDITIONS**

No Class 1 Modifications to the Hanford Facility RCRA Permit, DW Portion for this quarter.